

Jun Xiang

From: Podolsky, Matthew (USANYS) [Matthew.Podolsky@usdoj.gov]
Sent: Wednesday, July 05, 2017 6:44 PM
To: Daniel Gitner
Cc: Jun Xiang; Samantha Reitz; Echenberg, Janis (USANYS); Boone, Robert (USANYS) 1; Zhou, David (USANYS)
Subject: United States v. Percoco, et al., S1 16 Cr. 776 (VEC)

Dan,

Below please find our proposed schedule for pre-trial disclosures. This schedule assumes that Judge Caproni will sever the trials as suggested in the Government's Opposition, and therefore will change if Judge Caproni decides otherwise. The below schedule would apply to each trial separately.

Government's exhibit list: 4 weeks prior to trial

Government's witness list/3500: 3 weeks prior to trial

Government's 404(b) notice: 2 weeks prior to the deadline set by the Court for in limine motions

Defense disclosures: 2 weeks prior to trial

Expert witness notice: 6 weeks prior to trial

I note that we do not intend to re-produce any material (emails, documents etc.) that has already been produced as part of Rule 16 discovery for testifying witnesses.

Many thanks,

Matt

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